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5

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 **Northern Division**

9

10 SECURITIES AND EXCHANGE
COMMISSION,

11 Plaintiff,

12 v.

13 DAVID B. KAPLAN, ESQ.,

14 SYNCHRONIZED ORGANIZATIONAL

15 SOLUTIONS, LLC,

16 SYNCHRONIZED ORGANIZATIONAL

17 SOLUTIONS INTERNATIONAL, LTD.,

18 and MANNA INTERNATIONAL

19 ENTERPRISES, INC.,

20 Defendants,

21 and

22 LISA M. KAPLAN,

23 THE WATER-WALKING

24 FOUNDATION, INC., and

25 MANNA INVESTMENTS, LLC,

26 Relief Defendants.

27

28 Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda M. Du

**ORDER GRANTING STIPULATION
TO EXTEND TIME TO FILE A
MOTION FOR AN ORDER TO
DISBURSE THE DISTRIBUTON FUND**

**SECOND REQUESTED EXTENSION OF
TIME TO FILE A MOTION FOR AN
ORDER TO DISBURSE**

1 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as
2 follows:

3 1. On May 10, 2024, the Court ordered that Plaintiff United States Securities and
4 Exchange Commission (the “SEC” or “Commission”) shall file a Motion to Approve the
5 Distribution Plan (the “Distribution Plan”) by July 31, 2024, and a Motion for an Order to Disburse
6 the Distribution Fund (the “Motion”) by December 2, 2024. (ECF No. 175). The SEC filed the
7 Motion to Approve the Distribution Plan on July 31, 2024, and the Court approved the Distribution
8 Plan on August 30, 2024. (ECF No. 182).

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10 2. On September 30, 2024, Plan Notice and Certification Forms were mailed to 23
11 Preliminary Claimants. *See Status Report of Rust Consulting, Inc.* (ECF No. 183). To be
12 considered eligible for a distribution payment from the Distribution Fund, a Preliminary Claimant
13 was required to complete and return the Certification Form, along with any supporting
14 documentation, by November 14, 2024. *Id.*

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16 3. As of this date, 11 of the 23 Preliminary Claimants have returned the Certification
17 Form. Three Preliminary Claimants submitted disputes to the information provided by the
18 Distribution Agent on the Certification Forms. The Distribution Agent and the SEC have been
19 working to resolve the disputes. One of the Preliminary Claimants intends to submit supplemental
20 information next week to resolve their dispute. The resolution of the disputes may affect the
21 amount of the distribution payments to other Eligible Claimants.

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23 4. On December 10, 2024, the Court granted the SEC’s first request to extend the
24 deadline for filing the Motion to December 13, 2024.

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26 5. The SEC and counsel for Dean Properties, LLC have agreed to a second extension,
27 during which time the Distribution Agent and the SEC will continue to work to resolve the disputes
submitted by the Preliminary Claimants.

1 6. Accordingly, the Parties respectfully request that the time to file the Motion for an
2 Order to Disburse be extended until December 20, 2024.
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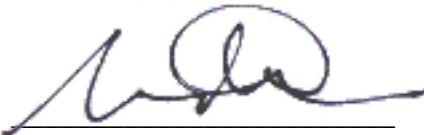
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21 Counsel for Dean Properties, LLC.

22 IT IS SO ORDERED:
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26 The Honorable Miranda M. Du
27 United States District Judge

28 DATED: December 13, 2024